

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 22, 2013.

Permit Number: **R30-08300025-2013**
Application Received: **November 16, 2016**
Plant Identification Number: **03-54-083-00025**
Permittee: **Armstrong Hardwood Flooring Company**
Facility Name: **Beverly Mill**
Mailing Address: **P.O. Box 160, Beverly, WV 26253**

Permit Action Number: *MM05* Revised: *February 28, 2017*

Physical Location:	Beverly, Randolph County, West Virginia
UTM Coordinates:	597.41 km Easting • 4,296.88 km Northing • Zone 17
Directions:	From Charleston take I-79 North to exit 99, proceed east on US Route 33 to Elkins. From Elkins take US Route 250 South. The facility is located approximately 1.6 miles south of Beverly in Randolph County.

Facility Description

The Beverly facility manufactures finished and unfinished hardwood flooring under Standard Industrial Classification (SIC) code 2426. Green lumber is purchased and stacked in the Mill Yard to facilitate air drying of the lumber. The lumber is then further dried in the steam heated pre-dryer and/or one of 38 lumber kilns. Kiln-dried lumber is transferred by one of three lumber tilts to the Mill rough end saws. The rough end saws cut the lumber into strips for transfer to one of six lines of knot saws, side matchers, and end matchers. The unfinished wood flooring is graded, stacked and either stored or transferred to one of two finishing lines. Finished hardwood flooring is graded and packaged for shipment to mill customers.

The facility currently operates two wood fuel-fired boilers (each 48.8 MMBTU/hr) and a natural gas fired boiler (33.5 MMBTU/hr) to provide steam for the drying kilns, the stain curing ovens, and the building heating system. Each of the wood-fired boilers (001-01 & 001-02) is equipped with 7,600 square feet of

heat surface for generating steam from the combustion of wood waste. Sawdust and wood waste from the mill operations are collected in silos and burned as fuel. These boilers are designed to generate a maximum of 37,110 pounds of steam by burning a maximum of 6,445 pounds per hour of wood waste fuel. An electrostatic precipitator controls particulate matter emissions from the two wood fired boilers.

The purpose of this modification is to facilitate the relocation of a scrap grinder, rip saw and two knot saws to be used for re-sizing scrap for use in the lumber yard; this equipment will exhaust to two new dust collection systems. Additionally, this modification addresses the installation of a vacuum coater to replace manual spray touch up and the installation of a small (22 kW/29.5 hp) natural gas-fired emergency generator for backup power supply.

Emissions Summary

The facility's Potential to Emit (PTE) will increase as follows:

Pollutant	Change in PTE (TPY)
PM ₁₀	0.07
PM _{2.5}	0.07
NO _x	0.29
SO ₂	<0.01
CO	0.02
VOC	0.01

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of carbon monoxide (CO), nitrogen oxides (NO_x), and volatile organic compounds (VOCs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, Armstrong Hardwood Flooring Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate matter emissions.
	45CSR13	NSR permit.
	45CSR16	New stationary sources.
	45CSR30	Operating permit requirement.
	40CFR60, Subpart JJJJ	SI RICE NSPS.
	40CFR63, Subpart ZZZZ	RICE MACT.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1147U	December 27, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Equipment Changes

The following equipment was added with this permit modification:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
003-02	S33	Visually Distressed Finishing Line -Vacuum Coater	2017	3,620 ft ² /hr	N/A
004-01 ¹	N/A	Yard Operations – Lumber Kilns (steam-heated pre-dryer and 38 steam-heated lumber kilns to dry green lumber).	Various	130,000,000 Board-ft/yr	N/A
004-01	FUG	Yard Operations – Scrap Recovery (scrap grinder, rip saw, and knot saws)	2017	6,640 ft ² /hr	Dust Collection DC-01 & DC-02
005-01	S35	Natural Gas-fired Emergency Generator	2017	22 kW (29.5 HP)	N/A
N/A	N/A	Edge Coaters, parts washers, welding operations, and other activities	Various	N/A	N/A
001-04	S34 ²	Natural Gas Fired Boiler (with low-NO _x burners and flue gas recirculation)	2016	33.50 MMBtu/hr	N/A

¹This emission source is existing, but it was inadvertently removed from the Emission Units Table during a previous permitting action.

²This piece of equipment was already installed, but the Emission Point ID was revised to read S34 instead of S31.

The following control devices were also added with this modification:

Control Device ID	Emission Point ID	Control Device Description	Year Installed	Design Capacity
Dust Collection DC-01	---	Dust Collection System (DC-01) Nederman, Model No. S-750 (From Yard Operation – Scrap Recovery)	2017	3,500 SCFM
Dust Collection DC-02	---	Dust Collection System (DC-02) Nederman, Model No. S-1000 (From Yard Operation – Scrap Recovery)	2017	5,000 SCFM

R13-1147U

The following changes were made with this modification to incorporate changes made with R13-1147U:

- Condition 5.1.1 was revised to include emission limits for the Dust Collection Systems (DC-01 and DC-02).
- Condition 5.2.1, which addressed visible emission checks, was revised to reference the correct emission points and the new dust collectors.
- Condition 5.2.2 was revised to include baghouse specifications for the new dust collectors.
- Section 7.0 was added to address the new Natural Gas Fired Emergency Generator (005-01).

Section 7.0: Source-Specific Requirements for the Natural Gas-fired Emergency Generator (005-01)

The permit conditions of this section are summarized in the following table:

Condition Number	Summary of Requirements	R13-1147U Condition	40CFR60, Subpart JJJJ Requirement ¹
7.1.1.	Emission limits	7.1.1.	40 CFR § 60.4233(d)
7.1.2.	Comply with emission standards over entire life of the engine	7.1.2.	40 CFR § 60.4234
7.1.3.	Non-resettable hour meter	7.1.3.	40 CFR § 60.4237(c)
7.1.4.	Compliance demonstration methods	7.1.4.	40 CFR § 60.4243(b)
7.1.5.	Emergency engine operation requirements	7.1.5.	40 CFR § 60.4243(d)
7.1.6.	Maximum yearly hours of operation excluding emergency operation	7.1.6.	N/A
7.4.1.	Records of notifications, maintenance, and manufacturer documentation	7.4.1.	40 CFR § 60.4245(a)
7.4.2.	Records of monthly and total calendar year hours of operation and the reason for operating	7.4.2.	N/A
7.4.3.	Records showing that the twelve-month rolling total for the engine did not exceed 500 hr/yr	7.4.3.	N/A
7.4.4.	Records of hours of operation using non-resettable hour meter	N/A	40 CFR § 60.4245(b)

¹Per 40 CFR § 63.6590(c), compliance with 40CFR63, Subpart ZZZZ is achieved through compliance with 40CFR60, Subpart JJJJ.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.